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13 Counsel for Defendant TUIPULOTU

14
15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20
21 v.
22 NAIKANO TUIPULOTU,
23 Defendant.

24 Case No.: 4:24-mj-70198 MAG

25 **STIPULATION AND ORDER TO
26 CONTINUE STATUS CONFERENCE,
27 EXCLUDE TIME, AND EXTEND
28 DEADLINES UNDER THE SPEEDY
TRIAL ACT AND FED R. CRIM. P. 5.1
TO JUNE 7, 2024**

29
30 IT IS HEREBY STIPULATED, by and between the parties to this action that the status hearing
31 for defendant Naikano Tuipulotu scheduled for May 15, 2024, before the duty magistrate judge, be
32 continued to Friday, June 7, 2024, at 10:30 a.m. before the duty magistrate for status or arraignment
33 on information. The reason for the continuance is as follows: Defense counsel received additional
34 discovery on Friday, May 10, 2024, and is still reviewing it. Counsel needs time to complete its
35 review and continue to discuss the discovery and case in general with her client. The parties also
36 anticipate discussing a potential resolution which may result in a waiver of indictment and

1 arraignment on an information. The continuance is sought under the Speedy Trial Act. The parties
2 agree and stipulate that the time until June 7, 2024, should be excluded, under 18 U.S.C.
3 §3161(H)(7)(A) and (B)(iv), for effective preparation of counsel because the ends of justice served by
4 the granting of the continuance outweigh the best interests of the public and defendant in a speedy
5 and public trial for the reasons described above.

6 The parties further stipulate that, with the consent of the defendant, there is good cause for
7 extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and
8 for extending the 30-day time period for an indictment under the Speedy Trial Act for the reasons
9 discussed above. See Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

10
11 IT IS SO STIPULATED.
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13 Dated: May 13, 2024
14

15 JODI LINKER
Federal Public Defender
Northern District of California

16 _____/S/
17 JOYCE LEAVITT
Assistant Federal Public Defender
18

19 Dated: May 13, 2024
20

21 ISMAIL J. RAMSEY
United States Attorney
Northern District of California

22 _____/S/
23 JONAH ROSS
Assistant United States Attorney
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
NAIKANO TUIPULOTU,
Defendant

Case No.: 4:24-mj-70198 MAG

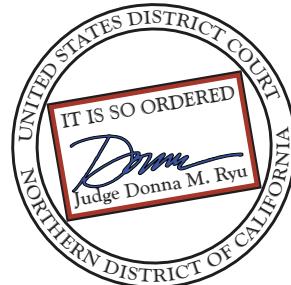
**ORDER TO CONTINUE STATUS
CONFERENCE, EXCLUDE TIME, AND
EXTEND DEADLINES UNDER THE
SPEEDY TRIAL ACT AND FED R.
CRIM. P. 5.1 TO JUNE 7, 2024**

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the status hearing for defendant Naikano Tuipulotu, currently scheduled for May 15, 2024, at 10:30 a.m., is continued to June 7, 2024, at 10:30 a.m., before the duty magistrate for status.

IT IS FURTHER ORDERED that the time until June 7, 2024, is hereby excluded from the Speedy Trial Act, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation taking into account due diligence. The Court finds that the ends of justice served by the granting of the continuance outweigh the best interests of the public and the defendant in a speedy and public trial. The Court further finds good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and extending the 30-day time period for an indictment under the Speedy Trial Act for the reasons discussed above. *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

IT IS SO ORDERED.

Dated: May 13, 2024



HON. DONNA M. RYU
Chief United States Magistrate Judge